

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA

David Seabrook,

Plaintiff,

v.

City of North Charleston, Charleston County  
EMS, Sgt. Robert Kruger, Officer Scott  
Thomes, K-9 Officer D. Green, Officer  
William Taylor, John Doe, April Gadsden,

Defendants.

C/A No.: 2:20-cv-03093-RMG-MGB

**DEFENDANTS' DESIGNATION  
OF EXPERT WITNESS<sup>1</sup>**

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure, Defendants City of North Charleston, Charleston County EMS, Sgt. Robert Kruger, Officer Scott Thames, K-9 Officer D. Green, Officer William Taylor, and April Gadsden by and through their undersigned counsel, hereby disclose and designate the following as expert witnesses:

**Major Brian S. Batterton, Esquire**

Cobb County Police Department

4400 Lower Roswell Road

Marietta, Georgia 30068

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Brian Batterton is a Major with the Cobb County Police Department and is also a licensed attorney. He has specialized expertise in the areas of law enforcement policies, practices, and procedures. His experience, background, and opinions in this matter are included in the attached expert report. (Exhibit 1).

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<sup>1</sup> Defendants received the report from Plaintiff's medical expert on September 13, 2021. Defendants would respectfully request additional time to name a medical expert due to the late disclosure of opinions.

Defendants also reserve the right to call any expert witness who may be required to substitute for an expert listed herein, in the event that the listed expert becomes unavailable to testify at trial due to circumstances beyond Defendants' control.

I, Christopher T. Dorsel, as attorney for Defendants, certify that Major Batterton's resume and fee schedule have been disclosed to Plaintiff's counsel.

Respectfully moved,

s/ Christopher T. Dorsel

CHRISTOPHER T. DORSEL (Fed. ID No. 9628)

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*Counsel for Defendants City of North Charleston,  
Charleston County EMS, Sgt. Robert Kruger, Officer  
Scott Thomes, K-9 Officer D. Green, Officer William  
Taylor, and April Gadsden*

September 13, 2021

Charleston, South Carolina